

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**V.**

**WILLIAM M. APOSTELOS, WMA  
ENTERPRISES, LLC, MIDWEST GREEN  
RESOURCES, LLC, and OVO WEALTH  
MANAGEMENT, LLC,**

## Defendants, and

**CONNIE APOSTELOS, APOSTELOS  
ENTERPRISES, INC., COLEMAN  
CAPITAL, INC., and SILVER BRIDLE  
RACING, LLC,**

### Relief Defendants.

**CASE NO. 1:15-cv-00699-SJD**

**JUDGE SUSAN J. DLOTT**

**PLAINTIFF UNITED STATES SECURITIES AND EXCHANGE COMMISSION'S  
RESPONSE TO MOTION OF DEFENDANTS WILLIAM APOSTELOS, ET AL.  
FOR CONTINUANCE TO ANSWER COMPLAINT**

Plaintiff United States Securities and Exchange Commission (“SEC”) respectfully submits this response to the motion of Defendants William Apostelos, *et al.* for a continuance to answer the complaint (Dkt. #15) (hereinafter, the “Motion”).

The SEC does not object to Mr. Apostelos’s request for a 20-day extension of time to answer the Complaint. However, the Motion should be denied in its entirety as to WMA Enterprises, LLC, Midwest Green Resources, LLC, and OVO Wealth Management, LLC (the “Corporate Defendants”). As corporate entities, the Corporate Defendants may only appear in federal court through licensed counsel and therefore may not be represented by Mr. Apostelos.

*See Rowland v. California Men's Colony, Unit II Men's Advisory Council*, 506 U.S. 194, 201-02 (1993); *Taylor Steel, Inc. v. Keeton*, 417 F.3d 598, 603 (6th Cir. 2005).

For the foregoing reasons, the SEC does not oppose the Motion as to Mr. Apostelos, but respectfully requests that the Court deny the Motion as to the Corporate Defendants.

Respectfully submitted,

s/ Meredith Jenkins Laval

Meredith Jenkins Laval, Trial Attorney

John E. Birkenheier, Trial Attorney

Amy S. Cotter

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*Attorneys for Plaintiff*

Dated: January 8, 2016

## **CERTIFICATE OF SERVICE**

I, Meredith Jenkins Laval, an attorney for the United States Securities and Exchange Commission, hereby certify that on January 8, 2016, a copy of the foregoing Plaintiff United States Securities and Exchange Commission's Response to Motion of Defendants William Apostelos, et al. for Continuance to Answer Complaint was served by ECF on Filing Users and by UPS on William M. Apostelos, WMA Enterprises, LLC, Midwest Green Resources, LLC, Connie Apostelos, OVO Wealth Management, LLC, Apostelos Enterprises, Inc., Coleman Capital, Inc., and Silver Bridle Racing, LLC at 5818 Wilmington Pike, Centerville, OH 45459.

s/ Meredith Jenkins Laval

Meredith Jenkins Laval